

1 **QUINN EMANUEL URQUHART & SULLIVAN, LLP**
2 Stephen A. Swedlow (admitted *pro hac vice*)
3 stephenswedlow@quinnemanuel.com
4 191 N. Wacker Drive, Suite 2700
5 Chicago, IL 60606
6 (312) 705-7400

7 *Interim Co-Lead Consumer Class Counsel*

8 **UNITED STATES DISTRICT COURT**
9 **NORTHERN DISTRICT OF CALIFORNIA**
10 **SAN FRANCISCO DIVISION**

11 MAXIMILIAN KLEIN, et al.,

12 Plaintiffs,

13 vs.

14 META PLATFORMS, INC.,

15 Defendant.
16
17
18
19
20
21
22
23
24
25
26
27
28

Consolidated Case No. 3:20-cv-08570-JD

The Hon. James Donato

**DECLARATION OF STEPHEN A.
SWEDLOW REGARDING MEET AND
CONFER PURSUANT TO COURT
ORDER DATED MARCH 23, 2022**

1 I, Stephen A. Swedlow, declare and state as follows:

2 1. I am an attorney at law duly admitted to practice before the courts of the State of
3 Illinois and admitted *pro hac vice* in this case. I am a Partner with the law firm of Quinn Emanuel
4 Urquhart & Sullivan, LLP, and Interim Co-Lead Counsel for the Consumer Class. I have personal
5 knowledge of the statements set forth in this Declaration.

6 2. I make this Declaration pursuant to the Court's March 23, 2022 Order (the "Order"),
7 Dkt. 263, directing lead counsel for the parties to meet and confer to resolve their disputes regarding
8 Plaintiffs' responses to Interrogatories Nos. 1-4 to Consumers and Interrogatory No. 1 to Advertisers
9 propounded by Defendant Meta Platforms, Inc. ("Facebook"), Dkts. 230, 259. I hereby attest to
10 compliance with the Court's Order.

11 3. On April 8, 2022, I met and conferred with Interim Co-Lead Counsel for the
12 Consumer Class Shana E. Scarlett, Interim Co-Lead Counsel for the Advertiser Class Yavar Bathaee
13 and Kristen M. Anderson, Lead Counsel for Facebook Sonal N. Mehta and David Gringer, and other
14 counsel for the parties, regarding Plaintiffs' responses to Facebook's interrogatories. The
15 conference lasted four-and-a-half hours.

16 4. At the time of the conference, I was not located within 100 miles of any other lead
17 counsel and therefore participated via videoconference. After four-and-a-half hours at the mandated
18 lead counsel conference, Consumer Plaintiffs and Facebook were unable to resolve all of their
19 disputes.

20 5. The parties have exchanged further correspondence and written proposals, and held
21 an additional conference on April 14, 2022 via videoconference. Consumer Plaintiffs and Facebook
22 are continuing to work towards resolving the remaining issues in dispute, but were unable to do so
23 at the time of this filing.

24 6. The parties have agreed, and propose to this Court, that they will file a stipulation or
25 joint letter addressing the remaining items in dispute no later than April 20, 2022.

1 I declare under penalty of perjury under the laws of the United States of America that the
2 foregoing is true and correct.

3 Executed this 15th day of April, 2022, in Chicago, Illinois.

4
5 /s/ Stephen A. Swedlow

6 Stephen A. Swedlow
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

CERTIFICATE OF SERVICE

I hereby certify that on this 15th day of April 2022, I electronically transmitted the foregoing document to the Clerk's Office using the CM/ECF System, causing the document to be electronically served on all attorneys of record.

Dated: April 15, 2022

By: /s/ Stephen A. Swedlow
Stephen A. Swedlow